

**From:** Kearse, Anne <akearse@motleyrice.com>  
**Sent:** Monday, June 8, 2020 7:26 PM  
**To:** Flahive Wu, Laura <lflahivewu@cov.com>  
**Cc:** Leyimu, Temitope "Tope" <tleyimu@motleyrice.com>; Christenson, Monique <mchristenson@motleyrice.com>  
**Subject:** Re: EXTERNAL-RE: City of Huntington Deposition Dates

**[EXTERNAL]**

Laura, This venue in Huntington, WV has agreed to facilitate our needs:

DoubleTree by Hilton Huntington Hotel

1001 3rd Ave, Huntington, WV 25701

304-525-1001

Point of Contact: Manager Eugene, 304-691-5413

The mountain health arena is not open yet. We figured defendants or Golkow would take care of scheduling the rooms? They have break out rooms, too, per protocol.

We can discuss tomorrow if any issues. Monique Christenson at mchristenson@motleyrice.com is managing our deposition calendar and helping coordinate logistics.

Anne

Anne McGinness Kearse  
Attorney at Law  
Motley Rice LLC  
28 Bridgeside Blvd.  
Mt. Pleasant, SC 29464  
843-216-9140

On Jun 8, 2020, at 6:43 PM, Flahive Wu, Laura <lflahivewu@cov.com> wrote:

Anne,

I wanted to check in with you directly about the deposition locations. Were you able to secure the Mountain Health Arena?

Thanks,

Laura

**Laura Flahive Wu**

Covington & Burling LLP  
One CityCenter, 850 Tenth Street, NW  
Washington, DC 20001-4956  
T +1 202 662 5982 | [lflahivewu@cov.com](mailto:lflahivewu@cov.com)  
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**From:** Kearse, Anne <[akearse@motleyrice.com](mailto:akearse@motleyrice.com)>  
**Sent:** Monday, June 08, 2020 10:53 AM  
**To:** Flahive Wu, Laura <[lflahivewu@cov.com](mailto:lflahivewu@cov.com)>  
**Cc:** Leyimu, Temitope "Tope" <[tleyimu@motleyrice.com](mailto:tleyimu@motleyrice.com)>; [xALLDEFENDANTS-MDL2804-Service@arnoldporter.com](mailto:xALLDEFENDANTS-MDL2804-Service@arnoldporter.com); [track2opioiddefendants@reedsmith.com](mailto:track2opioiddefendants@reedsmith.com); 2804 Discovery, MDL <[mdl2804discovery@motleyrice.com](mailto:mdl2804discovery@motleyrice.com)>; ct2 opioid\_team@mail-list com <[ct2 opioid\\_team@mail-list.com](mailto:ct2 opioid_team@mail-list.com)>; Farrell, Paul <[paul@farrell.law](mailto:paul@farrell.law)>  
**Subject:** Re: EXTERNAL-RE: City of Huntington Deposition Dates

[EXTERNAL]

Laura, How about 11:00 tomorrow. Anne

Anne McGinness Kearse  
Attorney at Law  
Motley Rice LLC  
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[Mt. Pleasant, SC 29464](http://mtpleasantsc29464.com)  
[843-216-9140](tel:843-216-9140)

On Jun 8, 2020, at 9:41 AM, Flahive Wu, Laura <[lflahivewu@cov.com](mailto:lflahivewu@cov.com)> wrote:

Anne,

Please let us know if you are available before noon ET today to discuss the deposition protocols. In the alternative, we could speak after 5 pm ET or tomorrow morning.

Best,

Laura

**Laura Flahive Wu**

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Washington, DC 20001-4956  
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**From:** Kearse, Anne <[akearse@motleyrice.com](mailto:akearse@motleyrice.com)>

**Sent:** Friday, June 05, 2020 3:52 PM

**To:** Flahive Wu, Laura <[lflahivewu@cov.com](mailto:lflahivewu@cov.com)>; Leyimu, Temitope "Tope" <[tleyimu@motleyrice.com](mailto:tleyimu@motleyrice.com)>; [xALLDEFENDANTS-MDL2804-Service@arnoldporter.com](mailto:xALLDEFENDANTS-MDL2804-Service@arnoldporter.com)

**Cc:** [track2opioiddefendants@reedsmith.com](mailto:track2opioiddefendants@reedsmith.com); 2804 Discovery, MDL

<[mdl2804discovery@motleyrice.com](mailto:mdl2804discovery@motleyrice.com)>; ct2 opioid\_team@mail-list com <[ct2 opioid\\_team@mail-list.com](mailto:ct2 opioid_team@mail-list.com)>; Farrell, Paul <[paul@farrell.law](mailto:paul@farrell.law)>

**Subject:** RE: EXTERNAL-RE: City of Huntington Deposition Dates

[EXTERNAL]

Laura, Shortly after you sent your protocol we received a draft protocol from Special Master Cohen. We have made some edits that should be comprehensive for our use in CT2 depositions. Best, Anne

**Anne McGinness Kearse** | Attorney at Law | Motley Rice LLC

28 Bridgeside Blvd. | Mt. Pleasant, SC 29464

o. 843.216.9140 | f. 843.216.9655 | [akearse@motleyrice.com](mailto:akearse@motleyrice.com)

**From:** Flahive Wu, Laura <[lflahivewu@cov.com](mailto:lflahivewu@cov.com)>

**Sent:** Thursday, June 4, 2020 5:11 PM

**To:** Leyimu, Temitope "Tope" <[tleyimu@motleyrice.com](mailto:tleyimu@motleyrice.com)>; [xALLDEFENDANTS-MDL2804-Service@arnoldporter.com](mailto:xALLDEFENDANTS-MDL2804-Service@arnoldporter.com)

**Cc:** [track2opioiddefendants@reedsmith.com](mailto:track2opioiddefendants@reedsmith.com); 2804 Discovery, MDL

<[mdl2804discovery@motleyrice.com](mailto:mdl2804discovery@motleyrice.com)>; Kearse, Anne <[akearse@motleyrice.com](mailto:akearse@motleyrice.com)>

**Subject:** EXTERNAL-RE: City of Huntington Deposition Dates

Counsel for Huntington,

Defendants accept the following deposition dates:

- Ray Canafax- Monday, June 15, 2020
- Jan Rader- Wednesday, June 17, 2020
- Hank Dial- Thursday, June 25, 2020
- Rocky Johnson- Friday, June 26, 2020

Defendants reserve the right to reschedule or reopen depositions to the extent relevant materials, including the witness's complete custodial file, are not produced reasonably in advance of the deposition.

We will get back to you shortly on the other dates offered.

Best regards,

Laura

**Laura Flahive Wu**

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T +1 202 662 5982 | [lflahivewu@cov.com](mailto:lflahivewu@cov.com)  
[www.cov.com](http://www.cov.com)

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**From:** Leyimu, Temitope "Tope" <[tleyimu@motleyrice.com](mailto:tleyimu@motleyrice.com)>  
**Sent:** Wednesday, June 03, 2020 9:52 AM  
**To:** Flahive Wu, Laura <[lflahivewu@cov.com](mailto:lflahivewu@cov.com)>; [xALLDEFENDANTS-MDL2804-Service@arnoldporter.com](mailto:xALLDEFENDANTS-MDL2804-Service@arnoldporter.com)  
**Cc:** [track2opioiddefendants@reedsmit.com](mailto:track2opioiddefendants@reedsmit.com); [ct2\\_opioid\\_team@mail-list.com](mailto:ct2_opioid_team@mail-list.com); 2804 Discovery, MDL <[mdl2804discovery@motleyrice.com](mailto:mdl2804discovery@motleyrice.com)>; Kearse, Anne <[akearse@motleyrice.com](mailto:akearse@motleyrice.com)>  
**Subject:** City of Huntington Deposition Dates

**[EXTERNAL]**

Counsel, please see the attached correspondence regarding City of Huntington Deposition dates.

Thank you,

**Temitope "Tope" Leyimu** | Attorney at Law | Motley Rice LLC  
28 Bridgeside Blvd. | Mt. Pleasant, SC 29464  
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